

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII**

Securities and Exchange Commission,

Plaintiff,

vs.

Semisub, Inc., Curtiss Edward Jackson, and  
Jamey Denise Jackson,

Defendants.

CIVIL NO. 22-00349-SOM-KJM

**DECLARATION OF COUNSEL**

**DECLARATION OF COUNSEL**

I, HARLAN Y. KIMURA, hereby declare as follows:

1. That I am the attorney representing Defendant CURTISS EDWARD JACKSON (“C. Jackson”) having been appointed pursuant to the Criminal Justice Act on or about October 14, 2022, in the criminal case entitled *United States of America vs. Curtiss E. Jackson, et al.*; Cr. No. 22-00093-01 JMS (“Criminal Case”).

2. I have been authorized by the District of Hawaii Criminal Justice Act Supervising Attorney, Francisco E. Celedonio, Esq., to make a special appearance in this civil case specifically to secure a stay of these proceedings in order to protect C. Jackson’s constitutional rights, and properly and adequately defend him in the Criminal Case.

2. The facts and representations set forth in the attached *Motion For Stay Of Proceedings Against Defendants Semisub, Inc. And Curtiss Edward Jackson* filed contemporaneously herewith are true and correct to the best of my knowledge, information, and belief.

DECLARE UNDER PENALTY OF PERJURY THAT THE  
FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY  
KNOWLEDGE, INFORMATION, AND BELIEF.

DATED at Honolulu, Hawaii, November 1, 2022.

—/s/ Harlan Y. Kimura—  
HARLAN Y. KIMURA